

Re: Freeplay Music, LLC v. Alibaba Group Holding Ltd. et al. (16-cv-01933-GBD)

Dear Judge Daniels:

We represent Plaintiff, Freeplay Music, LLC in the above referenced action. We submit this letter to request an adjournment of the May 11, 2016 initial pretrial conference. This is Plaintiff's first request.

Plaintiff filed this action on March 15, 2016. Plaintiff attempted to serve the defendants through its designated agent for service of process, Corporation Service Company ("CSC"), on March 23, 2016. On March 24, 2016, we received a letter from CSC, rejecting service of process. Plaintiff is in the process of investigating this issue, which will likely result in the filing of an amended complaint. As a result, we request an adjournment of at least 60 days of the May 11, 2016 initial pretrial conference.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

Tationa Markel